

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE DIGITEK®
PRODUCTS LIABILITY LITIGATION

MDL NO. 1968

THIS DOCUMENT RELATES TO ALL CASES

STATE OF NEW JERSEY)
) SS. **AFFIDAVIT OF PAUL GALEA**
COUNTY OF PASSAIC)

1. I am the Director, QA Operations at Actavis Totowa LLC (“Actavis Totowa”).
2. On December 9, 2009 I was deposed in the *In re Digitek Products Liability Litigation* (MDL No. 1968).
3. In February, 2007 I observed and assessed various aspects of operations at Actavis Totowa, an entity that had been acquired by Actavis Group in 2005.
4. Following my assessment of operations I prepared a candid report setting forth my observations and mental impressions of various aspects of operations at Actavis Totowa from a Good Manufacturing Practices (“GMP”) perspective.
5. I submitted my report to an individual in the Quality Systems Department of Actavis Group in Iceland. At all times, I intended that the information in my report remain confidential, by and between myself and the Actavis Group Quality Systems Department.

EXHIBIT A

6. The purpose of my report was to first assess Actavis Totowa operations so that, ultimately, the company could harmonize various aspects of Actavis Totowa GMP operations with GMP operations of other divisions or operating entities within Actavis on a global basis.

7. The scope of my assignment did not include a GMP compliance audit of Actavis Totowa. The assessment of Actavis Totowa that I conducted in February, 2007 was not an audit of any specific aspect of operations at Actavis Totowa, but was an observation-based evaluation intended to assess the status of GMP operations of certain areas of operations at Actavis Totowa compared to GMP operations of other divisions or operating entities within Actavis.

FURTHER AFFIDAVIT SAITH NAUGHT.



PAUL GALEA

SWORN TO AND SUBSCRIBED IN MY PRESENCE this 11 day of January,
2010.



NOTARY PUBLIC

Attorney at Law State of New Jersey

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